



**REEDER MCCREARY**  
— L L P —

October 18, 2023

The Honorable Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square Room 430  
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

Dear Judge Netburn:

We represent the Plaintiff, Lynne Freeman, in the above captioned matter. We write to thank the Court for issuing its recent Second Amended Scheduling Order (ECF No. 269) and request a modification on one issue.

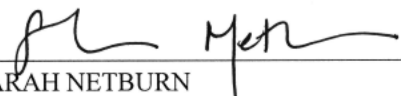
Pursuant to an August 16, 2023, joint letter filed by the parties, the previous Amended Scheduling Order provided that "Plaintiff shall file one motion for summary judgment against all Defendants. The brief in support of the motion shall not exceed 30 pages." The Second Amended Scheduling Order provides that "Plaintiff shall file two motions for summary judgment against the Publishing Defendants and the Prospect Defendants. Each brief in support of the motion shall not exceed 25 pages."

We respectfully request that Your Honor modify the language in the Second Amended Scheduling Order to conform to the language in the Amended Scheduling Order, subject to leaving the due date Monday, November 20, 2023.

We discussed the issue with Defendants counsel, and they have no objection to the change.

We thank the Court for its time and attention to this matter.

Plaintiff's request to modify the language in the Second Amended Scheduling Order is GRANTED. Each motion for summary judgment shall not exceed 30 pages.  
**SO ORDERED.**

  
SARAH NETBURN  
United States Magistrate Judge

Dated: October 19, 2023  
New York, New York

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Respectfully submitted,

**Reeder McCreary, LLP**

A handwritten signature in dark ink, appearing to read 'Mark D. Passin', with a large, sweeping loop at the beginning.

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Mark D. Passin  
11766 Wilshire Boulevard,  
Suite 1470  
Los Angeles, CA 90025  
310-861-2475

**DONIGER/BURROUGHS**

Stephen Doniger, Esq.  
603 Rose Avenue  
Venice, California 90291  
(31) 590-1820  
stephen@donigerlawfirm.com  
*Attorneys for Plaintiff Freeman*

cc: All counsel of record (via ECF)